

5-20-76

EEE BRANCH REVIEW

DATE: IN _____ OUT _____ IN _____ OUT _____ IN 5-19 OUT 5-20
FISH & WILDLIFE ENVIRONMENTAL CHEMISTRY EFFICACY

FILE OR REG. NO. 26693-E

PETITION OR EXP. PERMIT NO. _____

DATE DIV. RECEIVED 12-29-75

DATE OF SUBMISSION _____

DATE SUBMISSION ACCEPTED _____

TYPE PRODUCT(S): (I) D, H, F, N, R, S _____

PRODUCT MGR. NO. 12

PRODUCT NAME(S) Killmaster II

COMPANY NAME Positive Formulators, Inc.

SUBMISSION PURPOSE New product

CHEMICAL & FORMULATION
Chlorpyrifos2.0%
Aromatic petroleum solvent1.2%
Petroleum distillate94.7%

200.0 Introduction

This is a review of data provided in support of a new product containing 2.0% Chlorpyrifos. Method of support 2.b.

200.1 Uses

For the control of cockroaches, ants and silverfish. Residual activity claim for up to twelve months.

200.2 Background

This is a review of data which was to have been associated with the efficacy review dated 01 April 1976. For additional background see prior review.

201.0 Data Summary

See attached xerox copies.

202.0 Conclusions

The claim for cockroaches was found acceptable by the review dated 01 April 1976. No duration claim, however, was deemed acceptable on the basis of the data available at the time of that review. The data currently under review consists of three tests designed after the proposed CSMA Lucite Ring Test. While the Lucite Ring Test is insufficient for the purpose of establishing basic product performance, this in that it fails to allow for possible avoidance, it does provide a measure of residual activity. The data are sufficient to support a claim for residual control up to 12 months.

Due to the tests having been performed only with painted plywood surfaces, a label restriction must be incorporated which limits application to non-porous surfaces. Testing of vinyl tile will be required prior to the elimination of this labeling requirement.

While the residual activity data provided in support of cockroach claims may be bridged to ants and silverfish, the absence of basic biological activity data precludes the acceptance of these claims.

202.1 Claims supported by the data submitted

The claim for cockroach control up to twelve months is acceptable.

This claim must be mitigated ^{by} a use direction statement instructing the applicator to apply this product only to non-porous surfaces.

At such time as acceptable residual activity data is submitted for vinyl tile application, this use direction may be eliminated in favor of use directions prohibiting only the application of this product to concrete surfaces.

The label must also bear the statement, "length of effectiveness may vary in different situations." This statement is necessitated by the inability of the test method to demonstrate consistent residual life under all possible environmental conditions to which the product may be subjected.

202.2 Claims not supported by the data submitted

- The claims for ants and silverfish are not acceptable

Basic biological activity data must be either submitted or referenced in support of these claims.

202.2.4. Additional claims data will support

The residual control claim for cockroaches may be extended to read "up to 14 months".

The 13 month residual activity data will not support a further extension of the claim.

Ralph C. Wright
Entomologist
EEEB